

**Exhibit A**  
**To**  
**Defendants' Motion For Leave To File**  
**Supplemental Declaration Of Shawn G. Hansen**  
**Regarding Authentication Of Prior Art Exhibits**  
**In Opposition To Plaintiffs' Motion For**  
**Temporary Restraining Order And Preliminary**  
**Injunction**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

LL&L INNOVATIONS, LLC, and  
LOWDOWN DISTRIBUTION, INC.,

Plaintiffs,

v.

JERRY LEIGH OF CALIFORNIA, INC.;  
KOHL'S DEPARTMENT STORES, INC.; JC  
PENNEY CORPORATION, INC.; RUSTY  
NORTH AMERICA, LLC; HOT TOPIC  
MERCHANDISING, INC.; and SUN COAST  
MERCHANDISE CORPORATION d/b/a  
SUBSCOPE,

Defendants.

Civil Action No.: 2:10-cv-829-TC

U.S. District Judge Tena Campbell

**SUPPLEMENTAL DECLARATION OF  
SHAWN G. HANSEN IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION FOR  
TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

**JURY DEMANDED**

I, Shawn G. Hansen, declare as follows:

1. I am an attorney licensed to practice in the State of Utah. I am a partner with Manatt, Phelps & Phillips, LLP counsel for Defendants in the above-referenced matter. I have personal knowledge of the following facts. If called as a witness, I could and would testify competently to these facts.

2. Defendants' Prior Art **Exhibit 2-A** is a true and correct copy of an article regarding the O'Neill jacket, entitled "O'Neill Unveils 'The Hub' Snowboard Jacket with Bluetooth," dated January 16, 2004, which I downloaded from the web site Cellular Online at: [http://www.cellular.co.za/technologies/bluetooth/oneil/oneill\\_hub-jacket.htm](http://www.cellular.co.za/technologies/bluetooth/oneil/oneill_hub-jacket.htm).

3. Defendants' Prior Art **Exhibit 2-B** is a true and correct copy of one of the images associated with the article attached as **Exhibit 2-D** regarding the O'Neill jacket, entitled

“Bluetooth MP3 Snowboarding Jacket from O’Neill,” which I downloaded from the website Gizmag at: <http://www.gizmag.com/go/2520/picture/4132/>.

4. Defendants’ Prior Art **Exhibit 2-C** is a true and correct copy of another one of the images associated with the article attached as **Exhibit 2-D** regarding the O’Neill jacket, entitled “Bluetooth MP3 Snowboarding Jacket from O’Neill,” which I downloaded from the website Gizmag at: <http://www.gizmag.com/go/2520/picture/4133/>.

5. Defendants’ Prior Art **Exhibit 2-D** is a true and correct copy of the article regarding the O’Neill jacket, entitled “Bluetooth MP3 Snowboarding Jacket from O’Neill,” which I downloaded from the website Gizmag at: <http://www.gizmag.com/go/2520/>.

6. Defendants’ Prior Art **Exhibit 2-E** is a true and correct copy of an article regarding the O’Neill jacket, entitled “Jacket Features Built-in MP3 Player,” dated January 14, 2004, which I downloaded from the website PCWorld at: [http://www.pcworld.com/article/114311/jacket\\_features\\_builtin\\_mp3\\_player.html](http://www.pcworld.com/article/114311/jacket_features_builtin_mp3_player.html).

7. Defendants’ Prior Art **Exhibit 2-F** is a true and correct copy of an article regarding the O’Neill jacket, entitled “The O’Neill HUB Has Arrived,” dated September 1, 2004, which I downloaded from the website Surfer Magazine at: <http://forum.surfermag.com/forum/showflat.php?Cat=&Number=551213&page=0&view=collapsed&>.

8. Defendants’ Prior Art **Exhibit 2-G** is a true and correct copy of an article regarding the O’Neill jacket, entitled “Infineon Bluetooth Snowboard Jacket,” dated March 8, 2004, which I downloaded from the website I4U at: <http://www.i4u.com/article1252.html>.

9. Defendants’ Prior Art **Exhibit 2-H** is a true and correct copy of an article regarding the O’Neill jacket, entitled “Snowboarding Jacket with Built in Phone Controls,” dated

January 15, 2004, which I downloaded from the website cellular-news at: <http://www.cellular-news.com/story/10430.php>.

10. Defendants' Prior Art **Exhibit 2-I** is a true and correct copy of an article regarding the O'Neill jacket, entitled "O'Neill Hub," dated January 14, 2004, which I downloaded from the website Cool Hunting at: <http://www.coolhunting.com/style/oneill-hub.php>.

11. Defendants' Prior Art **Exhibit 2-J** is a true and correct copy of an article, entitled "Hoodies with Built in CD Player – Headphones in the hood," dated January 16, 2005, which I downloaded from the website Halfbakery at: [http://www.halfbakery.com/idea/Hoodies\\_20with\\_20Built\\_20in\\_20CD\\_20Player](http://www.halfbakery.com/idea/Hoodies_20with_20Built_20in_20CD_20Player).

12. Defendants' Prior Art **Exhibit 2-K** is a true and correct copy of an article, entitled "Headphone Toque," dated January 17, 2005, which I downloaded from the website Halfbakery at: [http://www.halfbakery.com/idea/Headphone\\_20Toque](http://www.halfbakery.com/idea/Headphone_20Toque).

13. Defendants' Prior Art **Exhibit 2-L** is a true and correct copy of United States Patent Application Publication No. 2006/0075537, entitled "Jacket or pullover for MP3 player with wireless remote control," filed on October 8, 2004, and published on April 13, 2006.

14. Defendants' Prior Art **Exhibit 2-M** is a true and correct copy of United States Patent Application Publication No. 2006/0147052, entitled "Audio headphone having wireless transceiver and analog audio input," filed on January 4, 2005, and published on July 6, 2006.

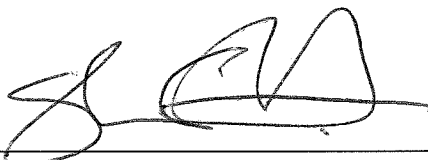
15. Defendants' Prior Art **Exhibit 2-N** is a true and correct copy of United States Patent No. 2,285,083, entitled "Two-way radio garment," filed on March 30, 1940, and issued on June 2, 1942.

16. Defendants' Prior Art **Exhibit 2-O** is a true and correct copy of United States

Patent No. 6,743,756, entitled "Control device for wearable electronics," issued on June 22, 2004, as a continuation of U.S. Patent Application Serial No. 09/759,020, filed on January on January 11, 2001.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 17, 2010, at Salt Lake City, Utah.



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Shawn G. Hansen

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